Case 2:23-cv-08604-MEMF-MRW Document 21-1 Filed 05/22/24 Page 1 of 9 Page ID #:193

been changed to Kyiv, Ukraine (Exhibit B).

3

2

- 1. I have personal knowledge of the facts set forth herein and first-hand knowledge of same. If called upon to testify and placed under oath I could and would testify competently thereto.
- 56
- 2. I am the founder and principal attorney of Omni Legal Group, which represents plaintiff Jobiak LLC in this litigation.

7

8

3. Before filing this complaint, I, as Plaintiff's counsel, conducted a thorough search regarding the Defendant's business location.

9

10

4. Despite the Defendant being incorporated in Delaware, an internet search I conducted revealed that Tarta. Ai claims its headquarters is in California, as shown on their LinkedIn and Twitter accounts. At least as late as April 6, 2024,

1112

Tarta.Ai's LinkedIn page identified Playa Vista, CA, as its headquarters (Exhibit A).

Defendant submitted this Motion to Dismiss on May 8, 2024, raising

1314

5.

jurisdictional grounds. I again conducted a search regarding the Defendant's business location and discovered that the headquarters on their LinkedIn page had

16

17

15

6. Furthermore, my search led me to associated LinkedIn pages related to Tarta.ai, which list their headquarters as Los Angeles, CA (Exhibit C). In particular,

18 19

20

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I noticed that these associated pages share the same operating logo as the Defendant.

2122

Executed this 22nd day of May, 2024, at Los Angeles, California.

24

25

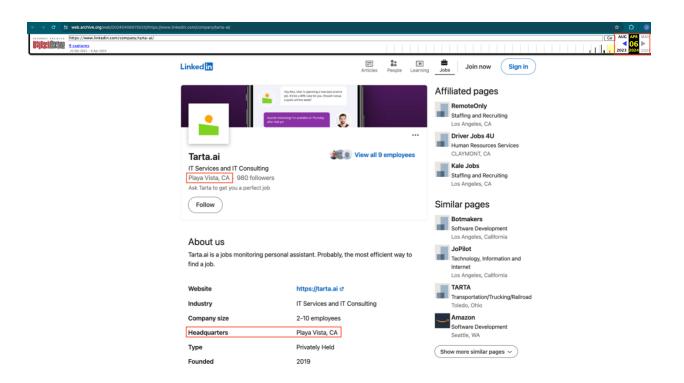
23

/s/ Omid E. Khalifeh

26

Omid E. Khalifeh

EXHIBIT A



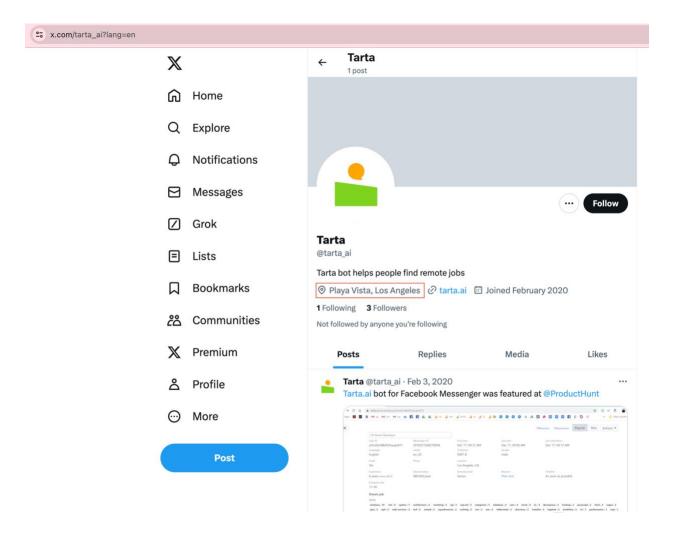


EXHIBIT B

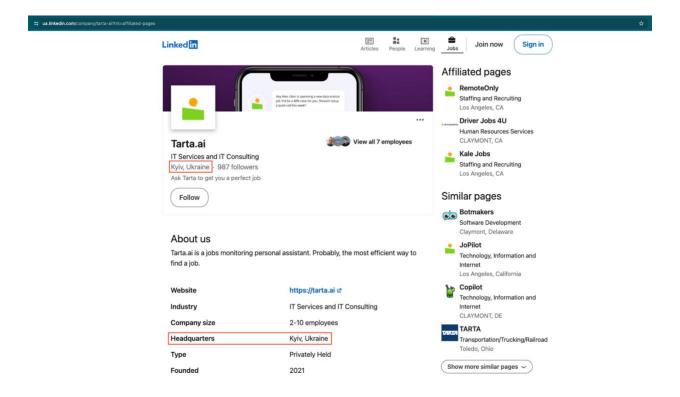


EXHIBIT C

